

200


July 26, 1994
750 Pad
DOE RFETS
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The waste analysis plan submitted indicates the fingerprinting (abbreviated waste analysis) only includes specific gravity. The Division agrees with the specific gravity sampling, but also requests some additional sampling. Since the spill of B-Pond material had a pH orders of magnitude greater than the Haliburton pH results for the B-Pond material, the Division requests pH sampling be included in the fingerprint analysis. In order to address spill response and health and safety concerns, the Division is also requesting Gross Alpha, Beta, and Gamma analysis to be performed on a representative number of tanks. At least 10% of the tanks should be included in the analysis. The parameters listed above meet the minimum requirements for the waste analysis plan specific to this unit that is adequate to ensure safe storage of the sludge. Additional information will be required in order to comply with 6 CCR 1007-3, Part 268, LDR regulations.

Additionally, the Division is requiring that the permit Modification request #12 dated October 1992 for container storage on the 750 pad be formally withdrawn, since it is not applicable. A new permit application that addresses tank storage, in the form of a class 2 permit modification, must be submitted for the 750 Pad tanks. The permit modification must be submitted no later than 180 days of the date that you receive this letter in accordance with 6 CCR 1007-3, Section 100.11(b).

If you have any questions concerning this matter, please contact either Chris Gilbreath at (303) 692-3371 or Lisa Weers at (303) 692-3451.

Sincerely,



Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

cc: S. Tarlton, Rocky Flats Program Unit
M. Johnson, Jefferson County Health Department
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